

7 May 2019

By email to raf.demczuk@wlegal.co.uk

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Our ref SXT1/AJW4

Your ref RD/LBE/01

Dear Sirs

Squire Patton Boggs (UK) LLP v London Block Exchange Ltd
Case number: CR-2019-001356

We write in response to your letter dated 4 May 2019, in respect of the service of our evidence.

Insofar as your second paragraph is concerned, we make the following comments using your numbering:-

- 1 Please clarify "some" difficulty and "some" of them. Identify the precise problem and the precise emails you have been unable to open and why.
- 2 Incorrect, please see your emails of 22 March and 4 April 2019.
- 3 We are aware of the provisions of the CPR relating to service.
- 4 Please clarify the point you are trying to make here.

In the circumstances, our evidence has not been served 2 days late.

In respect of the passport copy, the General Data Protection Regulations ("**GDPR**") allow the processing of personal data if it complies with a legal obligation (Article 6). The legal obligation here is our duty to produce an accurate statement of facts. The GDPR also allows processing where the parties have a "legitimate interest", clearly the case here too.

Given that the use of the passport copy is necessary in documenting the truth of the contents of our witness statement and will have a minimal privacy impact on the director, we see no reason for the use of the passport copy to compromise his sensitive personal data. It has only been necessary to exhibit the passport copy at all because of the director's position

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that he did not engage this firm to undertake any work and that we did not have a valid retainer. We are perfectly entitled to produce evidence to contradict that assertion.

Notwithstanding the above, we are prepared to give an undertaking to the effect that we will not disclose the passport copy to any parties other than W Legal Limited and the Court, being the only entities to have received the witness statement and exhibit to date.

Yours faithfully



Squire Patton Boggs (UK) LLP

Enclosure